

January 2, 2020

VIA FOIAONLINE.GOV

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

Re: Freedom of Information Act Request

Dear Sir/Madam,

This is a request under the Freedom of Information Act (5 U.S.C. § 552).

I hereby request access to and/or copies of the following documents, which are filed with, retained by, or prepared by the U.S. Environmental Protection Agency (EPA), concerning the investigation of FCA US LLC's, Fiat Chrysler Automobiles N.V.'s, and Chrysler Group LLC's (collectively "FCA") Model Year 2014-2016 diesel light-duty vehicles (Dodge Ram and Jeep Grand Cherokee):

- a. All communications (including any attachments) pertaining to the investigation with or between any EPA official or employee and any employee or official of any state agency, including the California Air Resources Board (CARB);
- b. All communications (including any attachments) pertaining to the investigation with or between any EPA official or employee and any other U.S. Government agency official or employee;
- c. All communications (including any attachments) pertaining to the investigation with or between any EPA official or employee and any FCA employee or representative;¹
- d. All notes, memoranda, reports, or other documentation of any interviews or communications with any CARB official or employee, or with any FCA employee or representative;
- e. All documents or records (including any memoranda or presentations) provided by FCA to the EPA and/or CARB;
- f. All internal EPA communications (including any attachments) and documents pertaining to the investigation;

¹ For purposes of this request, all reference to employees or representatives of FCA should be read to include any employee or representative of V.M. Motori S.P.A. and V.M. North America, Inc., even prior to FCA's complete acquisition of V.M. in 2013.

- g. All documents, records, reports, opinions, memoranda, and internal and external communications relating to and regarding EPA's January 12, 2017 "Notice of Violation for Model Year 2014-2016 diesel light-duty vehicles (Dodge Ram and Jeep Grand Cherokee)"
- h. All documents, records, reports, opinions, memoranda, and internal and external communications relating to and regarding the complaint filed on May 23, 2017, at the request of the EPA Administrator against FCA US LLC, Fiat Chrysler Automobiles N.V., V.M. Motori S.P.A., and V.M. North America, Inc. (as defendants).
- i. All documents, records, reports, opinions, memoranda, and internal and external communications relating to and regarding any additional investigation done or findings made regarding FCA's diesel light-duty vehicles;
- j. All documents, records, reports, opinions, memoranda, and internal and external communications relating to and regarding Exhaust Gas Recirculation (EGR) software (including any software labelled "t_eng" or "tEng") purportedly used in the 2014-2016 Ram 1500 and model year 2014-2016 Jeep Grand Cherokee (collectively, "subject vehicles");
- k. All documents, records, reports, opinions, memoranda, and internal and external communications relating to FCA's proposed remedial actions to the EPA regarding the subject vehicles or later model years, including any proposed update to the software and calibrations;
- l. All documents, records, reports, opinions, memoranda, and internal and external communications relating to the January 10, 2019 Consent Decree entered into with FCA;
- m. All documents, records, reports, opinions, memoranda, and internal and external communications relating to the January 10, 2019 FCA civil settlement with the U.S. and California;

If it expedites the agency's release of the requested documents, I am willing to accept disclosure on an interim, rolling basis as they become available. Please do not wait for all of the agency's relevant systems of record to be searched, or all of its relevant records to be processed.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs.

To discuss any aspect of this request, please contact my colleague, Nicholas Reddick, at (202) 303-1156, or via email at nreddick@willkie.com. My preference is to receive these records in their original native electronic format, and if that is not available, in PDF image format (one image per record, in color as applicable) through my email address. If the records prove too large to attach via email, my colleagues or I can provide a secure FTP link in which to upload the records.

Respectfully submitted,

/s/ William J. Stellmach